

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CRIMINAL DIVISION



THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

-vs-

MARK NEIWEEM

Defendant

12MC1- 115397

PEOPLE'S FACTUAL PROFFER
IN SUPPORT OF SETTING BOND

NOW COME the People of the State of Illinois, Plaintiff herein, through their attorney ANITA ALVAREZ, State's Attorney of Cook County, by her Assistant Patrick Morley, and hereby present their factual proffer in support of setting bond.

I. Introduction:

Section 5/110-5 of the Illinois Code of Criminal Procedure sets forth criteria relevant to determining the amount of bail and conditions of release. 725 ILCS 5/110-5. The information used by the Court in its findings with regard to setting the amount of bail may be presented by way of written proffer based upon reliable information offered by the State. 725 ILCS 5/110-5.

Defendant Mark Neiweem ("defendant") is charged by complaint for preliminary examination with the felony offense of Solicitation for Possession of Explosives or Explosive or Incendiary Devices in violation of Chapter 720 Section 5/8-4 and Chapter 720, Section 5/20-2(a) of the Illinois Revised Statutes.

II. Defendant:

Defendant Mark Neiweem, also known as "Migs" ("MIGS") is 28 years old and resides in Chicago, Illinois. At present, MIGS is on probation for case number 10CR11145, for Aggravated Battery to a Police Officer, and MIGS has a previous misdemeanor conviction in 2009 for Aggravated Assault to a Police Officer, and 2005 for Criminal Damage to Property

III. The Facts:

On May 15, 2012, MIGS meet with associates in the Forrest Preserve in Cook County, Illinois. During the conversation, MIGS asked one of his associates if they had "funds for fun." The associate asked MIGS what he meant by the statement, and MIGS asked the associate to take a walk with him. The two people walked away from the group. Once alone MIGS told the associate not to talk to anyone about this and told the associate not to tell one of the other individuals at the gathering about what he was about to say, because that other person had what MIGS referred to as he had "diarrhea of the mouth" and that he sends reckless text messages that could bring law enforcement attention.

MIGS then stated to the associate that he wanted to obtain materials in order to make a pipe bomb. MIGS also stated that he needed a PVC Pipe, two PVC Caps, PVC Glue, and a several model rocket engines in order to construct a pipe bomb. MIGS told the associate that the associate could purchase the model rocket engines from a store known as the "Hobby Lobby."

Shortly thereafter, the two individuals rejoined the others, and entered a car. The car was stationary in a parking lot. MIGS sat in the seat directly ahead of the associate and MIGS then wrote on a slip of paper, crumbed it up and tossed it onto the floor in front of the associate who asked MIGS about the paper. MIGS stated that it was garbage. The associate then threw the paper out the window. When MIGS observed this, MIGS opened his door and retrieved the paper. MIGS told the associate that MIGS D did not want the other individual to see the paper. MIGS then pressed the paper into the palm of the associate's hand and stated that if the associate obtained the items and brought them to his house that he would create a bomb. The piece of paper contained a list of ingredients that MIGS requested in order to make the bomb.

IV. Bond Recommendation:

Section 5/110-5 of the Illinois Code of Criminal Procedure sets forth criteria relevant to determining the amount of bail and conditions of release. 725 ILCS 5/110-5. In particular, the Court may consider that the above-stated facts clearly demonstrate that the offense contemplated the use of violence. Based upon matters discussed herein, the People of the State of Illinois recommend that this Honorable court set a substantial cash bond in this case with a source of bail bond requirement.

Respectfully submitted,

ANITA ALVAREZ
STATE'S ATTORNEY OF COOK COUNTY

BY:  PATRICK MORLEY
Assistant State's Attorney